

FILED

APR 23 2007

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

1 Mark E. Ellis - 127159
Kimberly E. Lewellen - 243663
2 ELLIS, COLEMAN, POIRIER, LAVOIE, & STEINHEIMER LLP
555 University Avenue, Suite 200 East
3 Sacramento, CA 95825
Tel: (916) 283-8820
4 Fax: (916) 283-8821

5 Attorneys for DEFENDANT
SIMM ASSOCIATES, INC.

E-filing

6
7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

RS

10
11 RAMONA PATRICIA CARDON,

CV

Case No.:

Santa Clara County Case No. 108CV106682

2130

12 Plaintiff,

13 v.

**CERTIFICATE OF SERVICE OF NOTICE
TO ADVERSE PARTY OF REMOVAL TO
FEDERAL COURT**

14 SIMM ASSOCIATES, INC. a Delaware
corporation, and DEFENDANT DOES 1 through
15 10,

16 Defendants.

17
18 I, Alexandria M. Felix, certify and declare as follows:

19 I am over the age of 18 years and not a party to this action. My business address is 555
20 University Avenue, Suite 200 East, which is located in the city and county of Sacramento, California.

21 On April 23, 2008, I deposited into the U.S. mail a copy of the Notice to Adverse Party of
22 Removal to Federal Court, a copy of which is attached to this Certificate as **Exhibit 1**, to Plaintiff
23 RAMONA PATRICIA CARDON.

24 I declare under penalty of perjury that the foregoing is true and correct.

25 DATED: April 23, 2008

26
27 By

Alexandria M. Felix

28
- 1 -

CERTIFICATION AND NOTICE TO INTERESTED PARTIES

CERTIFICATE OF SERVICE

I, Alexandria Felix, declare:

I am a citizen of the United States, am over the age of eighteen years, and am not a party to or interested in the within entitled cause. My business address is 555 University Avenue, Suite 200 East, Sacramento, CA 95825.

On April 23, 2008, I served the following document(s) on the parties in the within action:

**CERTIFICATE OF SERVICE OF NOTICE TO ADVERSE PARTY OF REMOVAL TO
FEDERAL COURT**

	VIA ELECTRONIC SERVICE: The above-described document(s) will be delivered electronically through the Court's ECF/PACER electronic filing system, as stipulated by all parties to constitute personal service, to the following:
X	BY MAIL: I am familiar with the business practice for collection and processing of mail. The above-described document(s) will be enclosed in a sealed envelope, with first class postage thereon fully prepaid, and deposited with the United States Postal Service at Sacramento, CA on this date, addressed as follows:
	BY HAND: The above-described document(s) will be placed in a sealed envelope which will be hand-delivered on this same date by _____, addressed as follows:
	VIA FACSIMILE: The above-described document(s) was transmitted via facsimile from the fax number shown on the attached facsimile report, at the time shown on the attached facsimile report, and the attached facsimile report reported no error in transmission and was properly issued from the transmitting facsimile machine, and a copy of same was mailed, on this same date to the following:
	VIA OVERNIGHT SERVICE: The above-described document(s) will be delivered by overnight service, to the following:

Fred W. Schwinn
Consumer Law Center, Inc.
12 South First Street, Suite 1014
San Jose, CA 95113-2404

Attorneys for
PLAINTIFF RAMONA PATRICA CARDON

I declare under penalty of perjury under the laws of the State of California that the foregoing is a true and correct statement and that this Certificate was executed on April 23, 2008.

By, _____

Alexandria Felix

EXHIBIT 1

1 Mark E. Ellis - 127159
Kimberly E. Lewellen - 243663
2 ELLIS, COLEMAN, POIRIER, LAVOIE, & STEINHEIMER LLP
555 University Avenue, Suite 200 East
3 Sacramento, CA 95825
Tel: (916) 283-8820
4 Fax: (916) 283-8821

5 Attorneys for
SIMM ASSOCIATES, INC.

6
7
8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 COUNTY OF SANTA CLARA
10

11 RAMONA PATRICIA CARDON,

12 Plaintiff,

13 v.

14 SIMM ASSOCIATES, INC. a Delaware
corporation, and DEFENDANT DOES 1 through
15 10,

16 Defendants.
17

Case No.: 108CV106682

**NOTICE TO ADVERSE PARTY OF
REMOVAL OF ACTION TO FEDERAL
COURT**

18 To Plaintiff, and the State Court of California for the County of Santa Clara:

19 PLEASE TAKE NOTICE THAT a Notice of Removal of this action was filed in the United
20 States District Court for the Northern District of California on April 23, 2008, federal case number
21 pending.

22 A copy of the said Notice of Removal is attached to this Notice as **Exhibit A**, and is served and
23 filed herewith.

24 Dated: April 23, 2008

ELLIS, COLEMAN, POIRIER, LAVOIE, & STEINHEIMER LLP

25
26 By Kimberly E. Lewellen
Kimberly E. Lewellen
27 Attorney for
SIMM ASSOCIATES, INC.
28

CERTIFICATE OF SERVICE

I, Alexandria Felix, declare:

I am a citizen of the United States, am over the age of eighteen years, and am not a party to or interested in the within entitled cause. My business address is 555 University Avenue, Suite 200 East, Sacramento, CA 95825.

On April 23, 2008, I served the following document(s) on the parties in the within action:

NOTICE TO ADVERSE PARTY OF REMOVAL OF ACTION TO FEDERAL COURT

	VIA ELECTRONIC SERVICE: The above-described document(s) will be delivered electronically through the Court's ECF/PACER electronic filing system, as stipulated by all parties to constitute personal service, to the following:
X	BY MAIL: I am familiar with the business practice for collection and processing of mail. The above-described document(s) will be enclosed in a sealed envelope, with first class postage thereon fully prepaid, and deposited with the United States Postal Service at Sacramento, CA on this date, addressed as follows:
	BY HAND: The above-described document(s) will be placed in a sealed envelope which will be hand-delivered on this same date by _____, addressed as follows:
	VIA FACSIMILE: The above-described document(s) was transmitted via facsimile from the fax number shown on the attached facsimile report, at the time shown on the attached facsimile report, and the attached facsimile report reported no error in transmission and was properly issued from the transmitting facsimile machine, and a copy of same was mailed, on this same date to the following:
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Fred W. Schwinn
Consumer Law Center, Inc.
12 South First Street
Suite 1014
San Jose, CA 95113-2404

Attorneys for
PLAINTIFF RAMONA PATRICA CARDON

I declare under penalty of perjury under the laws of the State of California that the foregoing is a true and correct statement and that this Certificate was executed on April 23, 2008.

By. 

Alexandria Felix

1 Mark E. Ellis - 127159
Kimberly E. Lewellen - 243663
2 ELLIS, COLEMAN, POIRIER, LAVOIE, & STEINHEIMER LLP
555 University Avenue, Suite 200 East
3 Sacramento, CA 95825
Tel: (916) 283-8820
4 Fax: (916) 283-8821

5 Attorneys for DEFENDANT
SIMM ASSOCIATES, INC.
6
7

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10

11 RAMONA PATRICIA CARDON,

12 Plaintiff,

13 v.

14 SIMM ASSOCIATES, INC. a Delaware
corporation, and DEFENDANT DOES 1 through
15 10,

16 Defendants.
17

Case No.:
Santa Clara County Case No.: 108CV106682

**NOTICE OF REMOVAL OF ACTION
UNDER 28 USC § 1441(b) (FEDERAL
QUESTION)**

18 TO THE CLERK OF THE ABOVE-ENTITLED COURT:

19 PLEASE TAKE NOTICE that defendant SIMM ASSOCIATES, INC., hereby removes to this Court
20 the state court limited civil action described below:

21 1. On February 25, 2008, an action was commenced in the Superior Court of State of
22 California, County of Santa Clara, entitled RAMONA PATRICIA CARDON, Plaintiff, v. SIMM
23 ASSOCIATES, INC., et al., as case number 108CV106682

24 2. On March 24, 2008, SIMM ASSOCIATES, INC., received the Summons and
25 Complaint, attached hereto as **Exhibit A**.

26 3. This Court has jurisdiction to hear this case because this action is a civil action of which
27 this Court has original jurisdiction under **28 U.S.C. § 1331**, and is one which may be removed to this
28 Court by defendant pursuant to the provisions of **28 U.S.C. § 1441(b)** in that it arises under the federal

1 Fair Debt Collection Practices Act (15 U.S.C. § 1692, *et seq.*). (See, Exhibit A: Complaint, ¶¶ 6, 7, 18,
2 23, 24, Prayer for Relief ¶¶ d-e.)

3 4. SIMM ASSOCIATES, INC. is the only named defendant and submits the removal of
4 this action.

5 Dated: April 23, 2008

6 ELLIS, COLEMAN, POIRIER, LAVOIE, & STEINHEIMER LLP

7
8 By Kimberly E. Lewellen
9 Kimberly E. Lewellen
10 Attorney for
11 SIMM ASSOCIATES, INC.
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CERTIFICATE OF SERVICE

I, Alexandria Felix, declare:

I am a citizen of the United States, am over the age of eighteen years, and am not a party to or interested in the within entitled cause. My business address is 555 University Avenue, Suite 200 East, Sacramento, CA 95825.

On April 23, 2008, I served the following document(s) on the parties in the within action:

NOTICE OF REMOVAL OF ACTION UNDER 28 USC § 1441(b) (FEDERAL QUESTION)

	VIA ELECTRONIC SERVICE: The above-described document(s) will be delivered electronically through the Court's ECF/PACER electronic filing system, as stipulated by all parties to constitute personal service, to the following:
X	BY MAIL: I am familiar with the business practice for collection and processing of mail. The above-described document(s) will be enclosed in a sealed envelope, with first class postage thereon fully prepaid, and deposited with the United States Postal Service at Sacramento, CA on this date, addressed as follows:
	BY HAND: The above-described document(s) will be placed in a sealed envelope which will be hand-delivered on this same date by _____, addressed as follows:
	VIA FACSIMILE: The above-described document(s) was transmitted via facsimile from the fax number shown on the attached facsimile report, at the time shown on the attached facsimile report, and the attached facsimile report reported no error in transmission and was properly issued from the transmitting facsimile machine, and a copy of same was mailed, on this same date to the following:
	VIA OVERNIGHT SERVICE: The above-described document(s) will be delivered by overnight service, to the following:

Fred W. Schwinn
Consumer Law Center, Inc.
12 South First Street
Suite 1014
San Jose, CA 95113-2404

Attorneys for
PLAINTIFF RAMONA PATRICA CARDON

I declare under penalty of perjury under the laws of the State of California that the foregoing is a true and correct statement and that this Certificate was executed on April 23, 2008.

By. 

Alexandria Felix

1 Fred W. Schwinn (SBN 225575)
 2 CONSUMER LAW CENTER, INC.
 3 12 South First Street, Suite 1014
 4 San Jose, California 95113-2418
 Telephone Number: (408) 294-6100
 Facsimile Number: (408) 294-6190
 Email Address: fred.schwinn@sjconsumerlaw.com

5 Attorney for Plaintiff
 6 RAMONA PATRICIA CARDON

ENDORSED

2008 FEB 25 P 3:14

RECEIVED
 COUNTY OF SANTA CLARA
 BY: A. HAS
 1/2/08

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SANTA CLARA

108CV106682

10 RAMONA PATRICIA CARDON,

Case No. _____

11 Plaintiff,

LIMITED CIVIL CASE
 Amount demanded does
 not exceed \$10,000

12 v.

COMPLAINT

13 SIMM ASSOCIATES, INC., a Delaware
 14 corporation, and DEFENDANT DOES 1
 through 10,

California Civil Code § 1812.700, *et seq.*
 California Civil Code § 1788, *et seq.*

15 Defendants.

16
 17
 18 Plaintiff, RAMONA PATRICIA CARDON (hereinafter "Plaintiff"), based on
 19 information and belief and investigation of counsel, except for those allegations which pertain to the
 20 named Plaintiff or her attorneys (which are alleged on personal knowledge), hereby makes the
 21 following allegations:

22 INTRODUCTION

23 1. This Complaint seeks to remedy Defendants' violations of the Rosenthal Fair
 24 Debt Collection Practices Act, California Civil Code § 1788, *et seq.* (hereinafter "RFDCPA"), which
 25 prohibits debt collectors from engaging in abusive, deceptive and unfair practices.

26 JURISDICTION AND VENUE

27 2. The Court has jurisdiction over this action pursuant to California Civil Code
 28 § 1788.30(f), which allows enforcement in any court of competent jurisdiction. The California

1 Superior Court has jurisdiction over this action pursuant to California Constitution Article VI, § 10,
2 which grants the Superior Court "original jurisdiction in all cases except those given by statute to
3 other trial courts." The statutes under which this action is brought do not grant jurisdiction on any
4 other trial court in California.

5 3. This Court has jurisdiction over each Defendant named herein because, based
6 on information and belief, each defendant is a corporation or association authorized to do business
7 in California and registered with the California Secretary of State, or does sufficient business, has
8 sufficient minimum contacts in California, is a citizen of California, or otherwise intentionally avails
9 itself of the California market through the promotion, sale, marketing and/or distribution of goods
10 and services in California and thereby having such other contacts with California so as to render the
11 exercise of jurisdiction over it by the California courts consistent with traditional notions of fair play
12 and substantial justice.

13 4. Venue is proper in the Santa Clara Superior Court pursuant to California Code
14 of Civil Procedure ("C.C.P.") §§ 393 and 395.5, because one or more of the violations alleged in this
15 Complaint arise in the County of Santa Clara.

16 **PARTIES**

17 5. Plaintiff, RAMONA PATRICIA CARDON, is a natural person residing in
18 Santa Clara County. Plaintiff is a "debtor" within the meaning of Civil Code § 1788.2(h).

19 6. Defendant, SIMM ASSOCIATES, INC. (hereinafter "SIMM"), is a Delaware
20 corporation engaged in the business of collecting debts in this state with its principal place of
21 business located at: 800 Pencader Drive, Newark, Delaware 19702-3354. SIMM may be served as
22 follows: Simm Associates, Inc., c/o Gregory Simendinger, 800 Pencader Drive, Newark, Delaware
23 19702-3354. The principal purpose of SIMM is the collection of debts using the mails and
24 telephone, and SIMM regularly attempts to collect debts alleged to be due another. SIMM is a "debt
25 collector" within the meaning of Civil Code § 1788.2(c). SIMM is a third-party debt collector
26 subject to the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

27 7. The true names and capacities, whether individual, corporate, associate,
28 governmental, or otherwise, of Defendants, DOES 1 through 10, are unknown to Plaintiff at this

1 time, who therefore sues said Defendants by such fictitious names. When the true names and
2 capacities of said Defendants have been ascertained, Plaintiff will amend this Complaint accordingly.
3 Plaintiff is informed and believes, and thereon alleges, that each Defendant designated herein as a
4 DOE is responsible, negligently or in some other actionable manner, for the events and happenings
5 hereinafter referred to, and caused damages thereby to the Plaintiff, as hereinafter alleged.
6 Defendant, DOES 1-10, are, and each of them is, a "debt collector" within the meaning of Civil Code
7 § 1788.2(c). Defendant, DOES 1-10, are, and each of them is, a third-party debt collector subject
8 to the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

9 8. At all times herein mentioned, each of the Defendants was the agent, servant,
10 employee and/or joint venturer of his co-defendants, and each of them, and at all said times, each
11 Defendant was acting in the full course and scope of said agency, service, employment and/or joint
12 venture. Any reference hereafter to "Defendants" without further qualification is meant by Plaintiff
13 to refer to each Defendant, and all of them, named above.

14 FACTUAL ALLEGATIONS

15 9. On a date or dates unknown to Plaintiff, Plaintiff is alleged to have incurred
16 a financial obligation, namely a consumer credit account issued by Merrick Bank, (hereinafter "the
17 alleged debt"). The alleged debt was primarily incurred for personal, family or household purposes
18 and is therefore a "consumer debt" as that term is defined by Cal. Civil Code § 1788.2(f).

19 10. Sometime thereafter on a date unknown to Plaintiff, the alleged debt was
20 consigned, placed or otherwise transferred to Defendants for collection from Plaintiff.

21 11. On or about July 18, 2007, Defendants sent a collection letter to Plaintiff
22 which was Defendants' first written notice initially addressed to Plaintiff in connection with
23 collecting the debt.

24 12. A true and accurate copy of the July 18, 2007 collection letter from
25 Defendants to Plaintiff is attached hereto, marked Exhibit "1," and by this reference is incorporated
26 herein.

27 13. The collection letter (Exhibit "1") does not include the notice required by Cal.
28 Civil Code § 1812.700(a).

FIRST CAUSE OF ACTION

(Violation of the Rosenthal Fair Debt Collection Practices Act, Civil Code § 1788 *et seq.*)

14. Plaintiff brings the first cause of action against Defendants under the California Rosenthal Fair Debt Collection Practices Act ("RFDCPA"), California Civil Code §§ 1788-1788.33 and §§ 1812.700-1812.702.

15. Plaintiff repeats, realleges and incorporates by reference paragraphs 1 through 13 above.

16. Plaintiff is a "debtor" as that term is defined by the RFDCPA, Cal. Civil Code § 1788.2(h).

17. Defendant, SIMM, is a "debt collector" as that term is defined by the RFDCPA, Cal. Civil Code § 1788.2(c).

18. Defendant, SIMM is a third-party debt collector subject to the federal Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*

19. The financial obligation allegedly owed to Merrick Bank by Plaintiff is a "consumer debt" as that term is defined by the RFDCPA, Cal. Civil Code § 1788.2(f).

20. The collection letter (Exhibit "1") described above violates the RFDCPA. The violations include, but are not limited to, the following:

a. Defendants failed to include the notice required by Cal. Civil Code § 1812.700(a) in their first written notice to Plaintiff, in violation of Cal. Civil Code § 1788 *et seq.*, as incorporated by Cal. Civil Code § 1812.702.

21. Defendants' acts as described above were done willfully and knowingly with the purpose of coercing Plaintiff to pay the alleged debt, within the meaning of Cal. Civil Code § 1788.30(b).

22. As a result of Defendants' willful and knowing violations of the RFDCPA, Plaintiff is entitled to an award of a statutory penalty in an amount not less than one hundred dollars (\$100) nor greater than one thousand dollars (\$1,000), pursuant to Cal. Civil Code § 1788.30(b).

23. As a result of Defendants' violations of the RFDCPA, Plaintiff is entitled to

1 an award of statutory damages pursuant to 15 U.S.C. § 1692k(a)(2)(A), as incorporated by Cal. Civil
2 Code § 1788.17.

3 24. As a result of Defendants' violations of the RFDCPA, Plaintiff is entitled to
4 an award of her reasonable attorney's fees and costs pursuant to Cal. Civil Code § 1788.30(c) and
5 15 U.S.C. § 1692k(a)(3), as incorporated by Cal. Civil Code § 1788.17.

6 25. Pursuant to Cal. Civil Code § 1788.32, the remedies provided under the
7 RFDCPA are intended to be cumulative and in addition to any other procedures, rights or remedies
8 that the Plaintiff may have under any other provision of law.

9 **PRAYER FOR RELIEF**

10 Plaintiff requests that this Court:

- 11 a. Assume jurisdiction in this proceeding;
- 12 b. Declare that Defendants' collection letter attached hereto as Exhibit "1" violates the
13 Rosenthal Fair Debt Collection Practices Act, Cal. Civil Code § 1788 *et seq.*, and
14 Cal. Civil Code § 1812.700(a).
- 15 c. Award Plaintiff a statutory penalty in an amount not less than \$100 nor greater than
16 \$1,000, pursuant to Cal. Civil Code § 1788.30(b);
- 17 d. Award Plaintiff statutory damages in an amount not exceeding \$1,000, pursuant to
18 15 U.S.C. § 1692k(a)(2)(A), as incorporated by Cal. Civil Code § 1788.17;
- 19 e. Award Plaintiff the costs of this action and reasonable attorneys fees, pursuant to Cal.
20 Civil Code § 1788.30(c) and 15 U.S.C. § 1692k(a)(3), as incorporated by Cal. Civil
21 Code § 1788.17; and
- 22 f. Award Plaintiff such other and further relief as may be just and proper.

23
24 CONSUMER LAW CENTER, INC.

25
26 By: 

27 Fred W. Schwinn, Esq.
28 Attorney for Plaintiff
RAMONA PATRICIA CARDON

Department 4121
PO Box 1259
Oaks PA 19456



SIMM ASSOCIATES, INC.

800 PENCADER DRIVE
NEWARK DE 19702
(302) 263-2800 • (800) 664-6033

Account #: 2456628	Balance: \$853.87
Client: MERRICK BANK	

3982 - 145

S-DNSIMM10 L-40 A-4120613080020143

P0088000700001 I00001
RAMONA CARDON
893 LENZEN AVE APT 314
SAN JOSE CA 95126-2750

SIMM ASSOCIATES, INC.
P.O. BOX 7526
NEWARK DE 19714-7526



Opt-Out Notice (See back for details)

Detach Upper Portion And Return With Payment

July 18, 2007

CLIENT: MERRICK BANK
BALANCE: \$853.87
ACCOUNT #: 4120613060020143

Dear RAMONA CARDON,

Our client is now taking the necessary steps to recover the outstanding amount of \$853.87. They have retained us to review your account and commence collection activity.

Enclose your payment in the envelope provided and make your check or money order payable to SIMM Associates, Inc. If you need to pay the above amount in monthly installments, call our office to make suitable arrangements.

This is an attempt to collect a debt by a debt collector. Any information obtained will be used for that purpose.

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, this office will assume the debt is valid. If you notify this office in writing 30 days from receiving this notice, this office will: obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you request this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor.

Sincerely,

Jeffrey S. Simendinger

Jeffrey S. Simendinger
Vice President
(800) 864-6033 ext. 512



PLEASE: To ensure proper credit remit payment directly to our office only.

Remit to:
SIMM Associates, Inc.
P.O. Box 7526
Newark, DE 19714-7526

Payments can be made via credit card or bankdraft at:
WWW.SIMMASSOCIATES.COM/PAYMENT.HTM

Please See Reverse Side For Important Information

Opt-out Notice Description: Checks received in our office may be electronically processed. This is a more secure process for our customers in that the check information cannot be seen by anyone after the payment is electronically converted. You may elect to not have your check processed electronically by checking the box provided on the front of this stub.

COLORADO RESIDENTS:

FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE www.ago.state.co.us/CADC/CADCmain.cfm.

MINNESOTA RESIDENTS:

This collection agency is licensed by the Minnesota Department of Commerce.

NEW YORK CITY RESIDENTS:

New York City Department of Consumer Affairs, license number 1135923.

MASSACHUSETTS RESIDENTS:

Notice of important rights

You have the right to make a written or oral request that telephone calls regarding your debt not to be made to you at your place of employment. Any such oral request will be valid for only ten days unless you provide written confirmation of the request postmarked and delivered within seven days of such request. You may terminate this request by writing to the collection agency.

If you wish to discuss this matter, please call us direct, between the hours of 8:00 am and 5 pm EST, at the telephone number listed on the front of this notice. Local address: 15 Union Street, Lawrence MA 01840. Office hours are: Mon-Thurs: 8 am - 8 pm, Fri: 8 am - 5 pm, Sat: 8 am - 12 pm EST.

TENNESSEE:

This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance.

MAINE Hours of operation:

Mon-Thurs: 8am - 10pm, Fri: 8am - 4pm, Sat: 8am - 12 pm EST.

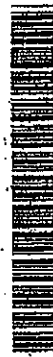
NORTH CAROLINA:

North Carolina Department of Insurance, permit number 3947.

WISCONSIN:

This collection agency is licensed by the Office of the Administrator of the Division of Banking, P.O.Box 7876, Madison, Wisconsin 53707

Department 4121
PO Box 1259
Oaks PA 19456



FIRST-CLASS MAIL
PRESORTED
US POSTAGE
PAID
PSC

FIRST-CLASS

3982-145

S-DNESMAM10 L 49 A-412083306020145
P0088000700001 100001
RAMONA CARDON
893 LENZEN AVE APT 314
SAN JOSE CA 95128-2750

ENCLOSURE

